

TO ALL EMPLOYEES:

You are all aware of the ongoing environmental work being undertaken around our plant at the oversight of the United States Environmental Protection Agency and the Mississippi Department of Environmental Quality. Ice Industries, as the lessee of the facility, has been cooperating for some time with these agencies and the parties performing the environmental work by making access on the property available to them, as needed, for their testing and related activities.

Last year, the EPA and MDEQ determined that indoor air testing should be undertaken inside of the Ice Industries Grenada facility. This testing was requested to determine if a chemical called trichloroethylene (TCE) might be entering the plant through a process known as vapor intrusion from the soil and groundwater under and around the plant. Ice Industries Grenada does not, and has never, used TCE in its operations. However, this chemical was used historically at the plant by previous owner/operators.

Indoor air testing at the plant is not new. The plant has been tested numerous time at the request of EPA over the last 15 years, and most recently by OSHA. To our knowledge, in all prior cases, the TCE results were under EPA's "screening" and OSHA's regulatory levels established for TCE. However, in 2015 EPA lowered its "screening" levels for TCE based on a multi-year evaluation of the chemical. We believe this is why EPA asked for another round of sampling last year.

The latest indoor air sampling was completed last fall, with EPA receiving the final validated data on January 3, 2017. While TCE results appear to us to be consistent with past sampling events, they are above EPA's new "screening" level for TCE (although they remain below OSHA standards). Therefore, EPA has identified actions they would like taken on both an interim and long-term basis. Ice Industries Grenada has been cooperating with EPA and the parties conducting the work, and will continue to do so.

The attached sheet contains the exact message that EPA requested on January 12, 2017 be provided by Ice Industries Grenada to all of you. You will see that, among other things, indoor air sampling is going to be repeated next week after EPA and the parties performing the work complete a full inspection of the facility. This will help them to better confirm the accuracy of the last round of results and confirm follow up actions to be completed.

Ice Industries Grenada will continue to cooperate with EPA and other parties in this matter. We have requested that EPA provide us with the name and contact information of one or more of their project personnel for anyone who has more questions. We will post that contact information once we receive it.

If you would like a copy of this memorandum and EPA's attached information sheet, please ask your supervisor and one will be provided.

ICE INDUSTRIES GRENADA

INFORMATION PROVIDED BY U.S. EPA TO ICE INDUSTRIES GRENADA FOR DISTRIBUTION TO ITS EMPLOYEES REGARDING INDOOR AIR TESTING AT THE GRENADA PLANT

- Air samples were collected at the Facility during the week of October 24, 2016.
- The EPA received the validated data on January 3, 2017, showing elevated levels of trichloroethene (TCE). TCE is a non-flammable, colorless liquid used as a solvent for cleaning metal parts, among other uses. It is a common groundwater contaminant and can evaporate, so can commonly be found as a vapor in air.
- Indoor air was sampled at 11 locations in both the administrative and manufacturing areas of the Facility. TCE was found to be above indoor air screening levels for industrial settings in all occupied indoor areas. Air from beneath the manufacturing building (known as "sub-slab") and from the basement were also sampled. All but one of the sub-slab samples showed TCE above screening levels.
 - o Screening levels are values used by the EPA to help determine if a contaminant should be considered for further evaluation.
- In five samples from the manufacturing areas, TCE was found to be above the indoor air action level for industrial settings for sensitive populations, which includes women of childbearing age (due to potential developmental impacts to a developing fetus in the first trimester of pregnancy). In the area near the former chrome plating line, TCE was found to be above the action level for industrial settings for non-sensitive populations (i.e., the general population).
 - o Action levels are values used by the EPA to identify where an action may be necessary to protect public health and/or the environment.
- These results indicate that TCE may be entering the Facility in the form of a gas from contaminated groundwater and soil beneath the building, a process known as "vapor intrusion." Groundwater sampling conducted over the past three decades show that there is contaminated groundwater underneath the Facility property.
- A second round of indoor air and sub-slab sampling is planned for the week of January 16, 2017.
- To address indoor air conditions at the Facility in the short term, the EPA requested on January 5, 2017, that the Facility take immediate steps to reduce TCE exposure, including increasing air ventilation within the Facility, adjusting HVAC systems to increase air circulation, real-time monitoring to measure air quality improvements, and any other measures necessary to mitigate current conditions.
- In the long term, the EPA is working with the Mississippi Department of Environmental Quality (MDEQ) and the Facility (including all relevant parties) to identify long-term measures to reduce and eliminate the current indoor air exceedances within the Facility.
- The health effects of TCE depend upon the pathway, amount, and time length of exposure to the chemical. Long-term exposure to TCE vapors could pose potential health risks.
- If you believe you have been exposed to TCE related to the Facility, you may want to consult your doctor. The Agency for Toxic Substances and Disease Registry (ATSDR) has TCE exposure training materials and information available for doctors in Mississippi upon request. The materials explain how you can be exposed to TCE, and how it affects your health. For more information, your doctors can contact:
 - o Mississippi Poison Control Center: (601) 984-5577 or (800) 222-1222
 - o Bruce Brackin, MSDH: (601) 576-7725
 - o Leann Bing, ATSDR: (404) 562-1784
- More information about the EPA's ongoing work in and around the Facility is available online at: www.epa.gov/grenadacleanup.